

3. Defense Counsel has represented Defendants in relation to the lawsuit, including preparation and filing of pleadings, discovery, attendance at hearings, and all other matters of the litigation.

4. On July 11, 2018, this Court entered an Order granting Plaintiff Big Cat Rescue Corp.'s Motion to Amend Pleadings in a related matter, *Big Cat Rescue Corp. v. G.W. Exotic Animal Memorial Foundation et al.*, Case No. CIV-14-377-SLP, allowing Plaintiff to Add Counterclaims against GWDG in that case.

5. Since the date of this and other Orders in CIV-14-377-SLP, a conflict has arisen that prevents Defense Counsel from continuing to represent GWDG. Defense Counsel and GWDG fundamentally disagree as to certain legal strategies relating to representation of GWDG, and GWDG member Jeff Lowe recently terminated Defense Counsel from representing any entities he controls in whole or in part, including GWDG.

6. Further, a concurrent conflict of interest has arisen between Schreibvogel and Lowe, the sole members of GWDG, which materially affects Defense Counsel's ability to represent either Defendant. *See* Oklahoma Rule of Professional Conduct 1.7(a).

7. Defense Counsel has discussed the necessity of withdrawal of representation with GWDG and Schreibvogel, and both Defendants have expressed their understanding and agreement regarding withdrawal.

8. On July 2, 2018, due to the volume of pending dispositive motions, this matter was stricken from the Court's August 2018 trial docket, and all remaining deadlines were stricken to be reset by the Court [Doc. 123]. No Scheduling Order is in place and there are no pending deadlines.

9. Defense Counsel states that this Motion is submitted in good faith and in the interests of justice, and not for purposes of delay, harassment, or inconvenience.

10. Defense Counsel is aware of the requirements of Local Civil Rule 83.5 which dictate that certain papers may continue to be served on Defense Counsel for forwarding purposes, unless and until the clients appear by other counsel or pro se, and Defense Counsel understands and accepts this responsibility. Also, Defense Counsel has provided notice of this requirement and Defendants consent to the same.

11. Given that GWDG is a limited liability company and cannot proceed pro se, and because Defense Counsel has no authority to continue representation of GWDG, Defense Counsel respectfully requests a thirty (30) day stay of this litigation in order to allow Defendants to obtain new counsel.

12. Counsel for all parties have been apprised of this Motion to Withdraw by way of this filing.

13. Due to GWDG's termination of counsel, as well as the concurrent conflict of interest that has arisen between GWDG and Schreibvogel which prevents Defense Counsel's continued representation of either Defendant, Defense Counsel respectfully requests the Court expeditiously consider this Motion and enter an Order Allowing Withdrawal.

WHEREFORE, premises considered, Defense Counsel respectfully requests the Court grant Defense Counsel's Motion to Withdraw.

Respectfully submitted,

s/Melanie K. Christians

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CERTIFICATE OF SERVICE

This is to certify that on the 27th day of August, 2018, the above document was electronically transmitted to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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s/ Melanie K. Christians